

REMARKS

The rejection of Claims 15, 2-4, 6 and 9-11 under 35 U.S.C. 102(e) as anticipated by O'Flynn et al. is considered to lack merit.

The O'Flynn et al. patent is not considered to teach, or even suggest, the filter defined by even Claim 15, the most generic claim.

Unlike the filter defined by Claim 15, the filter of the O'Flynn et al. patent does not comprise two different mesh materials, one of the materials having a surface to which scale is attracted.

Instead, the O'Flynn et al. patent shows only a single mesh material, the polyester material recited in column 2, lines 59-61. Further, there is no teaching, or even suggestion, in this patent that scale is attracted to the surface of the polyester material.

The rejection of Claim 5 under 35 U.S.C. 103(a) as unpatentable over O'Flynn et al. in view of Martindale is considered to lack merit.

The O'Flynn et al. patent is not considered to teach, or even suggest, the filter defined by Claim 5 for reasons given in regard to parent Claim 15.

Additionally, there is no teaching, or even suggestion, in the O'Flynn et al. patent of the filter shown therein having a

scale collector removably mounted to a carrier member on a frame of the filter.

Martindale is not considered to fill in any of the above-noted gaps in the teaching of O'Flynn et al.

Unlike the filter defined by Claim 5, the filter (strainer) of Martindale does not have a scale collector removably mounted to a carrier on a frame of the filter. In fact, there is no teaching, or even suggestion, in Martindale of a scale collector being present in the filter shown therein.

Further, there is no teaching, or even suggestion, in Martindale that the filter shown therein may comprise two different mesh materials to the surface of one of which scale is attracted. As clearly shown in column 2, lines 65-67, Martindale teaches only that a single piece of mesh material be employed in the filter shown therein and provides no teaching, or even suggestion of this mesh material having a surface to which scale is attracted.

It is therefore requested that this Honorable Board reverse the decision of the Primary Examiner and allow Claims 2-6, 9-11 and 15, all the claims on appeal.

Respectively submitted,

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